HONORABLE BARBARA J. ROTHSTEIN 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 9 SHANNON SPENCER, individually and on No. 2:23-CV-01723-BJR behalf of all others similarly situated, 10 Plaintiff, 11 STIPULATED MOTION v. FOR EXTENSION OF 12 PROVIDENCE ST. JOSEPH HEALTH TIME AND ORDER 13 FOUNDATION, a Washington nonprofit corporation doing business as PROVIDENCE; 14 and DOES 1-20, 15 Defendants. 16 **STIPULATION** 17 Plaintiff, Shannon Spencer ("Plaintiff"), and Defendant, Providence St. Joseph Health 18 Foundation ("Defendant") (collectively, the "Parties"), by and through their respective 19 undersigned attorneys, respectfully submit this Stipulated Motion for Extension of Time of the 20 following deadlines. 21 Pursuant to Federal Rule of Civil Procedure 6(b), the Parties jointly request as follows: 22 1. For Plaintiff's deadline to bring a Motion to Remand: 23 To extend the deadline for filing a Motion to Remand to August 2, 2024. 24 2. For the FRCP 26(f) conference and initial disclosures: 25 a. To set the FRCP 26(f) conference deadline to August 16, 2024; and 26 STIPULATED MOTION FOR EXTENSION K&L GATES LLP 925 FOURTH AVENUE OF TIME AND ORDER - 1

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b. To set the initial disclosure deadline to August 30, 2024.

The Parties privately mediated the matter on June 19, 2024. While the matter was not resolved at mediation, mediation efforts are ongoing. To accommodate ongoing mediation efforts, the Parties respectfully request this 30-day extension of time. This request is made to assist the Parties in facilitating a potential settlement and to provide them with the requisite time to prepare to meet the deadlines if this matter is not resolved following the conclusion of their ongoing mediation efforts.

DATED July 3, 2024

EMERY REDDY PLLC 1 2 By:/s/Timothy W. Emery Timothy W. Emery, WSBA #34078 3 Patrick B. Reddy, WSBA #34092 Paul Cipriani, WSBA #59991 4 600 Stewart Street, Suite 1100 Seattle, WA 98101 5 Phone: 206-442-9106 6 Email: emeryt@emeryreddy.com reddyp@emeryreddy.com 7 paul@emeryreddy.com Attorneys for Plaintiff 8 9 **K&L GATES LLP** 10 By: /s/Todd L. Nunn 11 Todd L. Nunn, WSBA # 23267 925 Fourth Avenue, Suite 2900 12 Seattle, Washington 98104-1158 Tel: +1 206 623 7580 13 Fax: +1 206 623 7022 14 Email: todd.nunn@klgates.com Attorney for Defendant 15 16 17 18 19 20 21 22 23 24 25 26

STIPULATED MOTION FOR EXTENSION OF TIME AND ORDER - 3

ORDER

Upon consideration of the Parties' Stipulated Motion for Extension, the Court finds that good cause exists to extend certain deadlines, and it is hereby **ORDERED** that the Motion is **GRANTED**.

It is **FURTHER ORDERED** that filing deadlines will be modified as follows.

Event	Current Date	New Date
Motion to Remand	July 3, 2024	August 2, 2024
FRCP 26(f) Conference	July 17, 2024	August 16, 2024
Initial Disclosure Deadline	July 31, 2024	August 30, 2024
Joint Status Report	August 7, 2024	September 6, 2024

DATED this 3rd day of July 2024.

Barbara J. Rothstein
United States District Judge

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